

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

BRET A. BROADDUS,	)	
	)	Case No. 08-C-04420
Plaintiff and Counter-Defendant,	)	
	)	Judge Amy J. St. Eve
v.	)	
	)	
KEVIN SHIELDS	)	
	)	Hearing Date: September 10, 2008
Defendant and Counter-Plaintiff.	)	Hearing Time: 8:30 a.m.

**MOTION FOR EXTENSION OF TIME TO REPLY OR OTHERWISE PLEAD TO  
DEFENDANT'S AFFIRMATIVE DEFENSES AND TO ANSWER OR OTHERWISE  
PLEAD TO THE COUNTERCLAIM**

NOW COMES Plaintiff and Counter-Defendant, Bret A. Broaddus, by his attorneys, Ariel Weissberg, Rakesh Khanna, Noelle Ansley and the law firm of Weissberg and Associates, Ltd., and as his Motion for Extension of Time to Reply or Otherwise Plead to Defendant's Affirmative Defenses and to Answer or Otherwise Plead to Counterclaim ("Counterclaim"), states as follows:

1. On May 30, 2000, Plaintiff filed his Complaint against Defendant, Kevin Shields ("Complaint") in the Circuit Court of Cook County, Illinois to initiate this action ("Complaint").
2. On July 7, 2008, Defendant was served with the Summons and Complaint.
3. On August 6, 2008, Defendant filed his Notice of Removal with this Court.
4. On August 12, 2008, Defendant filed his Defendant's Answer, Affirmative Defenses & Counterclaim.

5. Plaintiff is seeking an extension through September 24, 2008 to reply or otherwise plead to the Affirmative Defenses and answer or otherwise plead to the Counterclaim of Defendant.

6. This request is made because the Counterclaim and the Affirmative Defenses raise complex issues of fact and law, and Plaintiff require additional time to research and investigate the facts and the law raised therein. In addition, the Plaintiff is involved in numerous business, legal and financial matters that make his availability to meet and confer with counsel concerning this litigation extremely difficult in the next 10 days. In addition, counsel for Plaintiff is involved in trial preparation on a number of cases that will impact Plaintiff's counsel's availability in the next 10 days.

7. No prejudice will result to Defendant should the Court grant this Motion.

WHEREFORE, Plaintiff and Counter-Defendant, Bret A. Broaddus, respectfully requests that this Court enter an order extending the time for Plaintiff to reply or otherwise plead to the Affirmative Defenses and answer or otherwise plead to the Counterclaim of Defendant to September 24, 2008; and for such other and further relief that this Court deems just and proper.

**BRET A. BROADDUS**, Plaintiff and  
Counter-Defendant

By:           /s/ Ariel Weissberg            
One of his attorneys

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